IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA, :

Plaintiff, : CASE NO. 2:20-cr-62 (2)

vs. : JUDGE MORRISON

WHITNEY R. LANCASTER, :

Defendant. :

UNOPPOSED MOTION FOR RETURN OF DEFENDANT LANCASTER'S PASSPORT

Defendant Whitney Lancaster, through undersigned counsel, respectfully moves this Court for an Order authorizing Mr. Lancaster to retrieve his U.S. passport from the Clerk of Courts. The Government is unopposed to this request. The reasons in support of this Motion are set forth in the following Memorandum.

Respectfully submitted, **Taft Stettinius & Hollister LLP**

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MEMORANDUM IN SUPPORT

Defendant Whitney Lancaster, through undersigned counsel, is now before this Court requesting he be permitted to retrieve his previously surrendered U.S. passport from the Clerk of Courts. Counsel for Mr. Lancaster surrendered his passport to the Clerk's Office on April 2, 2020. A federal jury acquitted Mr. Lancaster on February 22, 2022. As such, Mr. Lancaster requests this Court authorize the Clerk's Office to release his previously surrendered passport to him. The Government is unopposed to this request. A proposed order is attached.

Respectfully submitted, **Taft Stettinius & Hollister LLP**

/s/ David H. Thomas DAVID H. THOMAS Ohio Supreme Court No. 0071492 P: (614) 334-6199 dthomas@taftlaw.com

/s/ Kathryn S. Wallrabenstein
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Counsel for Defendant Whitney Lancaster

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed with the Clerk of Court for the United States District Court for the Southern District of Ohio using the CM/ECF system, which will send notification of such filing to the following on October 18, 2022, by electronic mail:

Assistant U.S. Attorneys Kevin Kelley and Noah Litton 303 Marconi Boulevard, Suite 200 Columbus, Ohio 43215

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> /s/ David H. Thomas DAVID H. THOMAS